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METZGER, WICKERSHAM, KNAUSS & ERB, P.C.
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Attorney for Defendants,
Reliable Carriers, Inc.,
and Daniel Joseph Bemben

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN D. PERKEY and
THERESA M. PERKEY,

Plaintiffs

v.

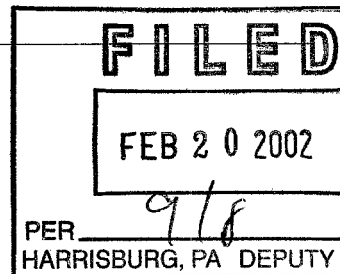
RELIABLE CARRIERS, INC.,
DANIEL JOSEPH BEMBEN and
KENT,

Defendants

CIVIL ACTION NO. 1:CV-00-1639

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JURY TRIAL DEMANDED



**PLAINTIFFS JOHN D. PERKEY AND THERESA M. PERKEY AND DEFENDANTS
RELIABLE CARRIERS, INC. AND DANIEL JOSEPH BEMBEN'S JOINT MOTION
FOR A JOINT CASE MANAGEMENT CONFERENCE**

AND NOW, Plaintiffs, John D. Perkey and Theresa M. Perkey, by and through their attorneys, Irwin, McKnight and Hughes, and Defendants, Reliable Carriers, Inc., and Daniel Joseph Bemben, by and through their attorneys, Metzger, Wickersham, Knauss & Erb, P.C., file this Joint Motion for a Joint Case Management Conference and in support thereof aver as follows:

1. Defendants, Reliable Carriers, Inc., and Daniel Joseph Bemben, are insureds of Reliance Insurance Company.

2. On October 3, 2001, the Commonwealth Court of Pennsylvania in the matter of M. Diane Koken, Insurance Commissioner of the Commonwealth of Pennsylvania v. Reliance Insurance Company, No. 269 M.D. 2001, entered an Order of Liquidation.

3. On October 26, 2001, Defendants' Motion for Stay was granted and this case was stayed for 90 days.

4. Following the issuance of the stay and the transfer of the file from Reliance Insurance Company to Pennsylvania Property and Casualty Insurance Guaranty Association ("PIGA"), it was determined that the Michigan Property and Casualty Guaranty Association is the appropriate governmental entity to handle the claims against Reliance insureds for policies written in Michigan.

5. Section 500.7945 of the Michigan Compiled Laws Annotated stays matters in Michigan in which the insolvent insurer is a party or in which the insurer is obligated to defend or has assumed the defense of a party for 6 months from the date the receiver is appointed, and for any additional time as determined by the court which has jurisdiction over those proceedings, to permit proper defense of all pending causes of action.

6. On February 12, 2002, this Honorable Court granted Defendant's Motion for Extension of the Stay, extending the stay until April 3, 2002. The Order also scheduled this case for trial starting June 3, 2002.

7. Prior to the Stay, written discovery had been exchanged between the Parties. Also, the depositions of the Plaintiffs had been scheduled, but unfortunately had to be cancelled because of Reliance's liquidation.

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FROM-IRWIN, MCKNIGHT & HUGHES LAW OFFICES

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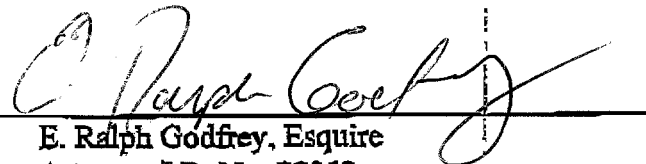
8. Since many of the dates previously agreed to in the original Joint Case Management Plan have expired, the Parties respectfully request that a Joint Case Management Conference be scheduled so that the Parties can adopt an Amended Joint Case Management Plan as well as set a new date for the trial of this matter.

WHEREFORE, the Parties respectfully request that this Honorable Court enter an Order scheduling a Joint Case Management Conference.

Respectfully submitted,

METZGER, WICKERSHAM, KNAUSS & ERB, P.C.

By

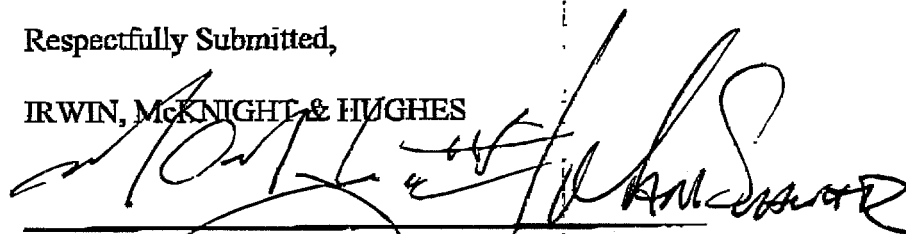


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Attorneys for Defendants

Dated: 2/20/02

Respectfully Submitted,

IRWIN, MCKNIGHT & HUGHES



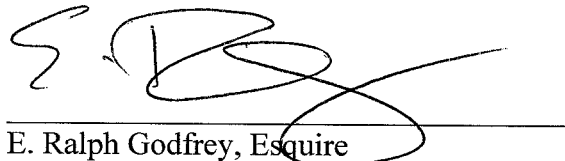
Marcus A. McKnight, III, Esquire
Mark D. Schwartz, Esquire
60 West Pomfret Street
Carlisle, PA 17013
717/249-2353
Attorney for Plaintiffs

Dated: February 19th, 2002

CERTIFICATE OF SERVICE

AND NOW, this 20th day of February, 2002, I, E. Ralph Godfrey, Esquire, of Metzger, Wickersham, Knauss & Erb, P.C., attorneys for Defendants, Reliable Carriers, Inc., and Daniel Joseph Bemben, hereby certify that I served a copy of the within Defendants Reliable Carriers, Inc., and Daniel Joseph Bemben's Motion for Extension of the Stay this day by depositing the same in the United States mail, postage prepaid, at Harrisburg, Pennsylvania, addressed to:

Marcus A. McKnight, III, Esquire
Irwin, McKnight & Hughes
West Pomfret Professional Building
60 West Pomfret Street
Carlisle, PA 17013-3222


E. Ralph Godfrey, Esquire